



## LAW OFFICES OF MICHAEL LUPOLOVER, P.C.

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ADMITTED IN NEW JERSEY

February 27, 2015

**VIA DNJ ECF**

Hon. William J. Martini  
United States District Court  
50 Walnut Street  
Newark, NJ 07101

**RE: First Request for Motion Extension Per Local Rule 7.1(d)(5)  
Clark v. Franklin Collection Services, Inc.  
Case No. 2:14-cv-08067-WJM-MF**

Dear Hon. Judge Martini:

Pursuant to *LR 7.1(d)(5)*, Plaintiff hereby respectfully requests an extension of Defendant's pending Motion to Dismiss set for hearing on March 16, 2015. *Dkt. #6*. Plaintiff has not made a prior request for relief under *LR 7.1(d)(5)* to extend the hearing date on Defendant's motion. Further, Plaintiff's counsel has conferred with Defendant's counsel and has been advised that Defendant does not object to the relief requested herein.

Per my discussions with the clerk today, the next available hearing date is April 6, 2015. Plaintiff's opposition shall be filed no later than March 23, 2014. *LR 7.1(d)(2)*. Defendant's reply shall be filed no later than March 30, 2015. *LR 7.1(d)(3)*.

Very truly yours,

A handwritten signature in blue ink, appearing to read "David P. Force".

David P. Force, Esq.

CC: Cindy D. Salvo (Via ECF)  
Counsel for Defendant

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